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August 8, 1997

To: Rick Woodard, CALFED
From: Tom Mongan
Subject: Comments on Draft CALFED Water Quality Program Component Report

Pages E-4 and 3-1: Ziram should be added as a pesticide of concern. TIE results presented to the IEP Contaminants Project Work Team indicate Ziram probably causes the acute toxicity to fathead minnows observed in half of the Sacramento River water samples tested for toxicity.

Page E-6. Add. "It is also possible that elevated heavy metals from acid mine drainage into the upper Sacramento River has affected salmon races other than the fall run."

Page 2-3: Work by Dr. Jon Burau of USGS casts strong doubt on the concept of an "entrapment zone" positioned by Delta outflow, so the statement at the top of the page should be removed. Burau's work was reported at the Day Conference at the San Francisco Presidio this spring.

Table 3-4 "CALFED Water Quality Parameters of Concern Target Ranges:" The 3 - 7 ppm selenium (dry weight) target range for fish food should not be used without supplying detailed scientific justification to explain why levels this low are needed under conditions in the San Joaquin Valley.

Page 4-2, top paragraph: The time history of metal loading from acid mine drainage should be discussed, to help determine if mine drainage was an important contribution to the decline of Sacramento River salmon. Val Connor at CVRWQCB has done important work in this area.

Table 4-6, Page 4-11: A footnote should be added stating: "Industrial loading from refineries is primarily the selenite form of selenium. Loading from agricultural drainage is primarily the selenate form. Selenite is more toxic than selenate and is taken up more readily by organisms."

Appendix B, page 23, selenium water quality data: The reliability of the extremely high maximum value of 290 allegedly found by USGS at Freeport Marina should be carefully checked. If this is an outlier, it probably distorts the average value reported, and the median value would be a more reasonable representation of the central tendency of the results.

FACSIMILE COVER PAGE

To: Rick Woodard
From : Mongan
Subject : Microsoft Word - WQCOM.DOC
Pages (Including cover): 2

Time: 07:01:56
Date: 08/14/97

PLEASE DELIVER TO RICK WOODARD

Rick,

I hope these comments are useful.

Regards,

Tom Mongan

*Can't Tom replace
Lance Johnson representing
Nestlands.*

P.